

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

CARRIE MEYER,

Plaintiff,

v.

CASE NO.: 06-cv-14953

HON. AVERN COHN

REFERRAL JUDGE MONA K. MAZOUN

MACOMB TOWNSHIP OF MICHIGAN;  
JOHN BRENNAN, Individually and in his  
capacity as Township Supervisor, and  
JOHN BROGOWICZ, Individually and in his  
capacity as Human Resources Director,  
Jointly and Severally,

Defendants.

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**PROTECTIVE ORDER**

**IT IS HEREBY ORDERED** that any and all personnel records of Raymond Ahonen will be subject to the following protective conditions:

1. The information/documents shall be used solely and exclusively for purposes of this lawsuit. Such information shall not be used in or for other cases, proceedings or disputes, or for any municipal, commercial, business, competitive or any other purpose whatsoever.

2. The aforementioned information/documents may not be disclosed to any person other than counsel of record for the respective parties to this litigation, the paralegal and clerical staff of same, expert witnesses or consultants engaged by counsel, and the court and court personnel, under such safeguards as the court may direct so as to preserve and to protect the confidentiality of information/documents referenced herein.

3. All the persons to whom this confidential information and/or documents are disclosed are hereby enjoined from using the same except for response to a motion and for

preparation for trial and in the trial of this action (under such safeguards as the court may require) and from disclosing the same to any other person except as provided herein. A breach of the provisions of this Order shall be subject to appropriate sanctions, in the discretion of the court, as authorized by any statute, rule or the inherent power of the court, or as otherwise provided by law.

4. The provisions of this Order shall survive and remain in full force and effect after the entry of final judgment (including any appellate proceedings) in this case, whether by settlement or litigation.

5. The agreement of the parties embodied in this Order does not constitute an admission or agreement that any document or information is admissible as evidence in this case. Designation of any information as subject to this Order shall have no meaning or effect whatsoever with respect to the substantive issues in this proceeding or the claim or defenses of any party hereto.

Dated: November 06, 2007

s/Avern Cohn

**U.S. DISTRICT COURT JUDGE**

APPROVED AS TO FORM AND CONTENT:

By **s/Audrey J. Forbush**

AUDREY J. FORBUSH (P41744)

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By **s/Jamil Akhtar (w/consent)**  
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